

AODA - Multi-Year Accessibility Plan for the Integrated Accessibility Standards Regulation (IASR)

<u>Intent</u>

Mircom's Multi-Year Accessibility Plan outlines the policies and actions that we will put in place to improve opportunities for people with disabilities in accordance with the requirements communicated under the <u>Integrated Accessibility</u> Standards, Ontario Regulation 191/11.

Statement of Commitment

Mircom is committed to providing a barrier-free environment for all stakeholders including our clients/customers, employees, job applicants, suppliers, and any visitors who may enter our premises, access our information, or use our services. As an organization, we respect and uphold the requirements set forth under the *Accessibility for Ontarians with Disabilities Act* (2005), and its associated standards and regulations.

Mircom understands that we have a responsibility for ensuring a safe, dignified, and welcoming environment for everyone. We are committed to ensuring our organization's compliance by incorporating accessibility legislation into our policies, procedures, equipment requirements, training, and best practices. We will review these policies and practices annually, as organizational changes occur, or in anticipation of compliance deadlines. In addition, we will strive to meet the needs of individuals with disabilities in a timely and effective manner.

Providing an accessible and barrier-free environment is a shared effort, and as an organization, Mircom is committed to working with the necessary parties to make accessibility for all a reality. For more detailed information on our accessibility policies, plans, and training programs, please contact our Human Resources department.



<u>Plan</u>

I. GENERAL REQUIREMENTS

Accessibility Requirement	Description	Action	Status	Compliance Date
Establishment of Accessibility Policies	 Every obligated organization shall develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements referred to in this Regulation. Obligated organizations, other than small organizations, shall include a statement of organizational commitment to meet the accessibility needs of persons with disabilities in a timely manner in their policies. Make the documents publicly available, and shall provide them in an accessible format upon request 	 Mircom has developed the IASR – Employment Policy & the IASR – Information & Communications Policy The statement of organizational commitment will be included in the Multi-Year Accessibility Plan. These policies are available on the Mircom website and shall be provided in an accessible format upon request 	Completed	January 1, 2014
Accessibility Plans	Every obligated organization shall establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirements under this Regulation	 The Multi-Year Accessibility Plan has been developed and posted on our website. The Multi-Year Accessibility Plan will be reviewed and updated as required once every 5 years in consultation with persons with disabilities. 	The Plan will be reviewed and updated on an ongoing basis.	January 1, 2014



	 Post the accessibility plan on their website, and provide the plan in an accessible format upon request Review and update the plan at least once every 5 years in consultation with persons with disabilities and an accessibility advisory committee (if one exists) Prepare an annual status report on the progress of measures taken to implement the strategy including the steps taken to achieve compliance Post the status report on their website and provide the report in an accessible format upon request 	 The status on the progress of measures taken to achieve compliance will be noted on the Multi-Year Accessibility Plan. The status will be updated on an annual basis. The Multi-Year Accessibility Plan shall be provided in an accessible format upon request. 		
Training	 Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the <i>Human Rights Code</i> as it pertains to persons with disabilities to: All employees and volunteers All persons who participate in developing the organization's policies and All other persons who provide goods, services or facilities on behalf of the organization The training shall be appropriate to the duties of the employees, volunteers and 	 All required individuals have received online training on the Human Rights Code as it pertains to persons with disabilities. Training on the Employment Standard will be provided to the HR Department. Training on the Information & Communication Standard will be provided to: trainers, Marketing & IT. Senior Management will be trained on both the Employment Standard & the Information & Communications Standard. Training will be provided on an ongoing basis as 	Completed	January 1, 2015



other persons Every obligated organization shall provide training in respect of any changes to the policies on an ongoing basis Every large organization shall keep a record of the training provided, including the dates training was provided and number of individuals trained	changes to the legislation occur. The HR Department will maintain records of when the training was conducted and the number of individuals trained.	
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II. INFORMATION AND COMMUNICATIONS STANDARDS

Accessibility Requirement	Description	Action	Status	Compliance Date
Feedback	 Every obligated organization that has processes for receiving and responding to feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request. Every obligated organization shall notify the public about the availability of accessible formats and communication supports. 	 Feedback processes will be made accessible to clients or employees, upon request. This commitment is included in our policy. The availability of accessible formats and communication supports will be posted on Mircom's website. 	Completed	January 1, 2015
Accessible Formats & Communication Supports	 Accessible formats and communication supports should be provided in a timely 	 All requests will be accommodated in a timely manner at no additional 	Completed	January 1, 2016



	manner at a cost that is no more than the regular cost charged to other persons. • Every obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support. • The public shall be notified about the availability of accessible formats and communication supports.	cost. This commitment is included in our policy. Mircom will take into account the person's accessibility needs when customizing individual requests and shall consult with the individual to ensure suitability. This commitment is included in our policy. The availability of accessible formats and communication supports will be posted on Mircom's website.		
Accessible Websites & Web Content	 Large organizations shall make their internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 Level A All internet websites and web content must conform with the WCAG 2.0 Level AA by 2021. This includes all websites, web content and web-based applications that an organization controls directly or through a contractual relationship that allows for modification of the product. 	 Mircom will ensure our website and all web content published after January 1, 2012 conforms to the WCAG 2.0 Level A. Mircom will ensure all internet websites and web content conforms with the WCAG 2.0 Level AA by 2021. 	Completed	January 1, 2014 March 15, 2021



III. EMPLOYMENT STANDARD

Accessibility Requirement	Description	Action	Status	Compliance Date
Recruitment - General	 Every obligated organization shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process 	 Mircom will provide accommodations for all job applicants with disabilities, upon request. This will be stated on all Ontario internal and external job postings. 	Completed	January 1, 2016
Recruitment, Assessment or Selection Process	 During the recruitment process, an employer shall notify job applicants, when they are individually selected to participate in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used. If a selected applicant requests an accommodation, the employer shall consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability. 	 Accommodations will be made available, upon request, for the interview process and for other candidate selection methods. This will be stated on all Ontario internal and external job postings. Where an accommodation is requested, Mircom will consult with the applicant and provide or arrange for suitable accommodation. This commitment is included in our policy. 	Completed	January 1, 2016
Notice to Successful Applicants	 Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities. 	Mircom's IASR – Employment Policy is included in our onboarding package.	Completed	January 1, 2016



Informing Employees of Supports	 Every employer shall inform its employees of its policies used to support its employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. This information should be provided to new hires as soon as practicable. Employers shall provide updated information to its employees whenever there is a change to existing policies. 	 Mircom's IASR – Employment Policy is included in our Employee Handbook. All new hires are given a copy of the Employee Handbook on their first day. Mircom will ensure that employees are made aware of any changes to our policies. This commitment is included in our policy. 	Completed	January 1, 2016
Accessible Format and Communication Supports for Employees	Where an employee with a disability requests it, every employer shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for information needed to perform the employee's job and information generally available to other employees.	 When requested by an employee with a disability, Mircom will provide accessible formats and communication supports for information needed to perform the employee's job and information available to other employees. Mircom will consult with the employee to determine the best way to provide the accessible format or communication support. The above commitments are stated in our policy. 	Completed	January 1, 2016
Workplace Emergency Response Information	Every employer shall provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is	Where required, Mircom will create individual workplace emergency response information for employees with disabilities. This information will take into account the unique	Completed	January 1, 2012



Documented Individual	necessary and the employer is aware of the need for accommodation due to the employee's disability. If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, the employer shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee. Employers shall provide the information required under this section as soon as practicable after the employer becomes aware of the need for accommodation due to the employee's disability. The individualized workplace response information should be reviewed when the employee moves to another location, when the employee's overall accommodation plans/needs are reviewed, or when the employer reviews its general emergency response policies. Employers shall develop and	challenges created by the individual's disability and the physical nature of the workplace, and will be created in consultation with the employee. • Mircom shall provide the workplace emergency response information to any person designated to provide assistance to the employee with the disability, after obtaining the employee's consent. • The individualized workplace response information will be reviewed as required by the legislation. • The above commitments are stated in our policy.	Completed	January 1, 2016
Accommodation Plans	 Employers shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities. The process for the 	 The process for the development of individual accommodation plans is outlined in Mircom's IASR – Employment Policy. The process includes all the elements required by the 	Completed	January 1, 2010



Patura to Work Process	development of individual accommodation plans should include: The ways in which the employee can participate in the development of the plan; The means by which the employee is assessed on an individual basis; The ways that an employee can request an evaluation by an outside medical expert, or other experts (at the employer's expense) to determine if accommodation can be achieved, or how it can be achieved; The steps taken to protect the privacy of the employee's personal information; The frequency with which the individual accommodation plan should be reviewed or updated and how it should be done; The means of providing the accommodation plan in an accessible format, based on the employee's accessibility needs; and If an individual accommodation is denied, the manner in which the reasons for the denial will be provided to the employee.	legislation. • Mircom has developed a form to assist in documenting a formal, individual accommodation plan. This form can be obtained from Human Resources.	Completed	January 1, 2016
Return to Work Process	 Every employer shall develop and have in place a return to work process for its employees who have been absent from work due to a disability and 	 Mircom's return to work process is outlined in our IASR – Employment Policy. The process outlines the steps Mircom will take to 	Completed	January 1, 2016



	require accommodations in order to return to work. The return to work process shall outline the steps the employer will take to facilitate the return to work and use documented individual accommodation plans.	 facilitate the return to work. The process states that the return to work plan must be included in the employee's individual accommodation plan. 		
Performance Management	An employer that uses performance management in respect of its employees shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities.	 Mircom will consult individual accommodation plans and consider the accessibility needs of the employee during performance management (for e.g. when conducting a performance review or disciplinary action). This commitment is included in our policy 	Completed	January 1, 2016
Career Development & Advancement	An employer that provides career development and advancement to its employees shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities.	 Mircom will consult individual accommodation plans and consider the accessibility needs of the employee when offering career development or advancement opportunities. This commitment is included in our policy 	Completed	January 1, 2016
Redeployment	An employer that uses redeployment shall take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.	 The accessibility needs of employees with disabilities will be taken into account in the event of redeployment. Individual accommodation plans will be consulted, as required. This commitment is included in our policy 	Completed	January 1, 2016

